



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKP
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 22, 2019

By Hand and ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (NGG) (S-2)

Dear Judge Garaufis:

The government respectfully writes in response to the defendants' letter submitting follow-up questions for voir dire, Dkt. No. 572. The government also notes that while it has not presently raised any cause challenges to the prospective jurors, the government respectfully reserves its right to challenge any of these jurors for cause at the appropriate time during oral voir dire.

The government respectfully requests that the Court inquire further regarding the following questions in addition to those identified in the defendants' letter:

#	Additional Question(s)
74	76(d)
77	84
78	40
80	60
89	70
92	59

95	74, 87
105	44, 88, 89
106	33
107	16(a)
108	36
110	75, 76, 90
111	84
114	40, 75
116	55, 56, 58, 60, 87
117	62(b)
120	40, 45
124	56
133	60
140	67

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
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cc: Clerk of Court (NGG) (by ECF)
Counsel of Record (by ECF)